

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #41  
RV1  
Tonawanda Coke Corporation  
0201601  
Tonawanda, NY

**To:** Peter Lopez, EPA, Region 2  
Christopher Lyon, EPA ORA Region 2  
Walter Mugdan, EPA ORA, Region 2  
Angela Carpenter, EPA ERRD, Region 2  
John Prince, EPA ERRD, Region 2  
Eric Wilson, EPA ERRD, Region 2  
Joe Rotola, EPA RAB, Region 2  
Eric Mosher, EPA RPB, Region 2  
Tim Grier, EPA OLEM-OEM  
Leonard Voo, EPA DECA, Region 2  
Dore LaPosta, EPA DECA, Region 2  
Dan Harkay, EPA RAB, Region 2  
Shawna Hoppe, EPA RPB, Region 2  
Mark Pane, EPA RAB, Region 2  
Thomas Budroe, EPA RAB, Region 2  
Peter Lisichenko, EPA, RAB Region 2  
Dwayne Harrington, EPA RPB, Region 2  
Harish Patel, EPA DECA, Region 2  
Douglas McKenna, EPA DECA, Region 2  
James Doyle, EPA ORC, Region 2  
Margo Ludmer, EPA ORC Region 2  
Mary Mears, EPA PAD, Region 2  
Michael Basile, EPA PAD, Region 2  
James Quinn, NYSDEC  
Christopher LaLone, NYSDEC  
Kevin Hale, NYSDEC  
Peter Reuben, NYSDEC  
Bonnie Hriczko, EPA RAB, Region 2  
Tim Benton, Weston Solutions  
Ben Mcpherson, NYSDEC

**From:** Peter Lisichenko, OSC

**Date:** 4/25/2019

**Reporting Period:** 04/19/2019 through 04/25/2019

1. Introduction

1.1 Background

<b>Site Number:</b>	A28U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/17/2018	<b>Start Date:</b>	10/17/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NYD088413877	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses

a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted when conditions allow.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

An Action Memorandum confirming 3 verbal authorizations of funding and requesting additional funding and an Exemption from the 12 Month and \$2 million limitations on Removal Actions was out into concurrence on April 24, 2019. The Action Memorandum will be routed from the Regional Administrator to the Assistant Administrator for the Office of Land and Emergency Management.

A web inquiry regarding Tonawanda Coke Corporation Site applicability for EPA's Superfund program and the New York State's Brownfields program was received on April 17, 2019. A reply was provided on April 25, 2019.

The discharge of effluent from ST21 to the Town of Tonawanda Wastewater Treatment Plant continues to be pumped from the lower port to the discharge line. The discharge of ST21 is limited to active site hours, due to the pump's fuel capacity.

The transfer of material from the "moat" to the Weir tank continued this week. In addition, treated material from the Weir tank continues to be discharged to the Town of Tonawanda Wastewater Treatment Plant. The rate of discharge was increased this week from 2,300 gallons per day to 3,000 gallons based on analytical results received from the April 8, 2019 sampling event. A periodic discharge sample was collected by the RST contractor on April 22, 2019; results are anticipated April 29, 2019.

During a recent walk-through the Site this week, a large pan-like apparatus (4x8-feet) with metal top grating, was found filled and nearly overtopping with an oily substance. The apparatus had been left outside and exposed to the elements. Discussions with former plant employees determined that it had been used as an oil dump and drip station for drums and other containers during plant operations. The ERRS contractor removed the grating and emptied its contents. Removed material include 250 gallons of rain water and 30 gallons of oil and sludge mixed with metal shards and other debris. Oil, sludge and debris were containerized in a steel drum while the rain water was discharged to the "moat" for treatment. Once scraped clean, the apparatus was moved to the bone yard and positioned so that it would no longer accumulate water.

The decommissioning of Sump No. 1 and Sump No. 6 was completed this week by the ERRS contractor. Tasks included removing pumps and associated piping from the sump, pumping of water to the "moat" area, removing residual sludges, removing impacted surface soils adjacent to the sump, and backfilling the sump with crusher run gravel (with fines). The LGA Sump is to be addressed next.

Temperature monitoring of the LBA tower continues. No notable changes have been observed since the deactivation of the nitrogen supply on January 23, 2019. Real-time remote temperature monitors have been removed from the tower and the RST contractor has been tasked to provide a daily temperature check utilizing an infrared camera.

The monthly sampling event for the industrial discharge permit and the SPDES permit is scheduled for May 22, 2019 and will be performed by the RST contractor.

The removal of the coal, coke and breeze at the Site by Powers Coal & Coke continued this week. To date, approximately 7,889 tons of coal and 1,958 tons of breeze material have been removed.

Periodic maintenance of the storm water system continued this week. Tasks by the ERRS contractor included maintenance of the inclined retention basin (skimming of the surface water and readjusting the harbor boom that had been placed near the inlet to better capture surface material) and changing of absorbent boom at various catch basins throughout the Site.

The PRP for Site 108 is currently preparing a Tank Product Removal and Demolition Plan. The draft plan is scheduled to be provided to EPA by April 26, 2019 for review and comment.

#### 2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys. EPA is negotiating an Administrative Order on Consent regarding the Site 108 Phase 1 work with another PRP.

#### 2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

1. Continue to pump water from the containment and sump areas for treatment in the Weir tank. Periodic discharge to the sanitary sewer will be guided by analytical results from the Weir tank water samples to ensure compliance with the Industrial Use Permit.
2. Continue to maintain stormwater discharges. Tasks to include periodic maintenance of the retention basin and maintenance of absorbent boom placed at catchbasins adjacent to the Oil House.
3. Continue to discharge remaining liquids in the equalization tanks (ST21 and ST22) to the sanitary sewer system.
4. Continue to conduct monthly and semi-annual sampling events of discharges to the sanitary sewer system to ensure compliance with the Industrial Use Permit.
5. Continue to conduct monthly and semi-annual sampling events of stormwater discharges to ensure compliance with the SPDES Permit.
6. Continue to maintain essential services to the Command Post and Guard House including domestic water, sewer, electric, and heat.
7. Continue to maintain heat and electrical services at the Site 108 Pump House.
8. Remove contaminated surface soil and decontaminate sumps in the by-products area and backfill with crusher run gravel (with fines).
9. Develop and evaluate strategies to address the potentially pyrophoric material in the COG pipe infrastructure. Evaluations of the different strategies is to include cost effectiveness.
10. Develop a strategy for the removal of product lines and process vessels in the by-products area so that secondary containments can be decommissioned.
11. Identify tanks and vessels with residual material that may pose a threat and develop a strategy for the removal of the material which may include demolition of the structure.
12. Continue to clean the gas/coal tar secondary containment area "moat".

#### 2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

#### 2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

EPA is funding the Removal Action.

- October 14, 2018 - Verbal authorization provided a \$200,000 total project ceiling, of which \$150,000 was for mitigation contracting.
- October 18, 2018 - Verbal authorization provided a \$500,000 total project ceiling increase, of which \$400,000 was for mitigation contracting.
- November 20, 2018 - Verbal authorization provided a \$1,200,000 total project ceiling increase, of which \$1,000,000 was for mitigation contracting.
- April 17, 2019 - Authorization provided to increase mitigation contracting by \$100,000 to \$1,650,000.

The total project ceiling verbally authorized for the Site is \$1,900,000, of which \$1,650,000 is for mitigation contracting.

The costs below include pending costs.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$1,650,000.00	\$1,556,371.05	\$93,628.95	5.67%
TAT/START	\$250,000.00	\$67,316.92	\$182,683.08	73.07%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$1,900,000.00</b>	<b>\$1,623,687.97</b>	<b>\$276,312.03</b>	<b>14.54%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 2.5 Other Command Staff

No information available at this time.

### **3. Participating Entities**

#### **3.2 Cooperating Agencies**

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

### **4. Personnel On Site**

One OSC, 3 ERRS and 2 RST3 personnel.

### **5. Definition of Terms**

No information available at this time.

### **6. Additional sources of information**

### **7. Situational Reference Materials**

No information available at this time.